

AMENDED COMPLAINT
(for filers who are prisoners without lawyers)

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

(Full name of plaintiff)

Trevor L. Young Jr.

v.

Case Number:

22-C-1519

(Full name of defendant(s))

(to be supplied by Clerk of Court)

Det. Rosemarie Galindo, Sgt Erwin-

Estacio, Det. Vincent Lopez, Det-

Michael Washington, Det. Jeffrey-

Sullivan, Attorney Russell Jones

A. PARTIES

1. Plaintiff is a citizen of Wisconsin, and is located at
(State)

Waupun Correctional Institution
(Address of prison or jail)

2. Defendant All persons named above
(Name)

is (if a person or private corporation) a citizen of Wisconsin
(State, if known)

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and (if a person) resides at Unknown (Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for City of Milwaukee, State of Wisconsin (Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

While investigating the 2020 homicide of 'CLM' the lead detectives were Rosemarie Galindo & Michael Washington, they were assisted by Detectives Vincent Lopez, Jeffrey Sullivan, Sgt. Erwin Estacio etc. On or about 1-19-21 detectives Jeffrey Sullivan & Vincent Lopez had my car removed off the streets while it was parked and unoccupied with no notification giving to me before during or after my vehicle was a Audi A6 4.2 quattro 2005 which was registered to my name and identified with a dealership temp tag (T7980T). After calling around, the city tow lot notified me

that my vehicle was located there with a police hold. After repeatedly calling Lopez and Sullivan (in an effort to have my vehicle returned and to know what was going on), I contacted Internal Affairs due to the detectives refusing to return my car and them giving me ultimatums stating that I would not get my car back unless I came and spoke with them even though they informed me that I was not obligated to talk to them. Sgt. Rodney Washington from "IA" informed me that he had spoken with detectives and was told that my vehicle would be returned to me after processing on it was complete which was about the first week of February 2021. Around that time I called Lopez & Sullivan who both told me I would not get my car back until I came and spoke with them. During this time I had no transportation means so I offered for them to come see me which they declined stating that they would only speak with me at the police station. At this time I was working as a custodian and also as a 'freelancing' doing yard jobs. Because of me not being 'mobile' I lost my job, wages and opportunities.

My vehicle was finally released after the 4-11-22 trial was complete. No evidence of the alleged crime that was being investigated was found on or in my vehicle. I was arrested on about 4-21-21 for a parole violation warrant unrelated to their investigation. The homicide was believed to have occurred inside of the victim's vehicle which was in police possession as of 1-6-21 until the release of the vehicle / crime scene to the next of kin on 4-8-21, about 13 days before my arrest. A report from Rosemarie Galindo states that on 4-8-21 Sgt. Estacio approved the release of the victim's vehicle. Lopez emailed Joseph Anderer assigned to the tow lot relating that the vehicle could be released. Galindo authorized a po-s on the title which was signed by Estacio. During my trial, Galindo and other officers testified to being knowledgeable and aware that all physical evidence should be preserved until the defense has had a chance to inspect/examine it. Police theory is that the killer entered/exited the victim's vehicle multiple times before killing the victim... it should be noted that my DNA was excluded as any DNA found on the outside/inside of the vehicle or any DNA found on the victim. Medical examiner Brian Peterson's report and testimony lists the wound entry being from the left at an indeterminate range. Indeterminate was identified as being 2ft or more away. These findings were inconsistent with the police theory but any testing of the blood splatter, trajectory or findings of additional

bullet strikings would not be possible to locate based on photographs taken by police. During prelim Lopez stated that there was nothing to distinguish the non-plated vehicle on video believed to be the killers car from any other car of its make/model. During trial Sgt. Estacio revealed that he was the person who 'identified' the vehicle on the video and that it was a Audi A6 model 2.0 from the years of 2005-2008, my vehicle was a specific Audi A6 4.2 quattro from the year of 2005. Russell Jones presented no defense nor called any witnesses he named during the start of trial, one of whom was my alibi witness. I still maintain my innocence.

C. JURISDICTION

I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR

I am suing under state law. The state citizenship of the plaintiff is different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$_____.

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

If I win I would like to receive \$250,000.00 for the emotional & mental stress as well as loss of wages I suffered due to the seizure of my car. I would also like to receive \$500,000.00 due to the polices' intentional misconduct / deprivation of my constitutional rights based on the victims vehicle being released to the next of kin ~~without~~

E. JURY DEMAND

I want a jury to hear my case.

- YES

- NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 11th day of April 2023.

Respectfully Submitted,

Travis Yerz
Signature of Plaintiff

546255

Plaintiff's Prisoner ID Number

Waupun Correctional Institution

P.O. Box 351 Waupun, WI 53963

(Mailing Address of Plaintiff)